

SEALED

ORIGINAL

United States District Court

SOUTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

DONALD SACHTLEBEN

CASE NUMBER: 1:12-mj-316-TAB

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about the dates listed below in each separate Count, in Hamilton County, in the Southern District of Indiana, the defendant, DONALD SACHTLEBEN,

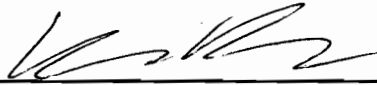
Count 1: Knowingly distributed child pornography on or about October 25, 2011, and

Count 2: Knowingly possessed child pornography on or about May 11, 2012,

in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4)(B). I further state that I am a Special Agent and that this complaint is based on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof.




Special Agent Kerri Reifel
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

May 12, 2012
Date

Tim A. Baker, U.S. Magistrate Judge
Name and Title of Judicial Officer

at Indianapolis, Indiana
City and State

Signature of Judicial Officer

AFFIDAVIT

I, Kerri L. Reifel, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI for ten years. I am currently assigned to the Indianapolis Cyber Crime Task Force. While employed by the FBI, I have investigated federal criminal violations including crimes against children, parental kidnappings, non-familial child abductions, high technology or Cyber crime, child exploitation, and child pornography. I have participated in the investigation and prosecution of approximately 75 cases involving child exploitation or abuse.

2. I have attended multiple Crimes Against Children conferences over the past nine years and have taken certification courses relating to undercover online sexual exploitation of children investigations. I am also a certified child forensic interviewer. I am a member of the Indiana Internet Crimes Against Children (ICAC) Task Force, which includes numerous federal, state and local law enforcement agencies.

3. Prior to becoming an FBI agent, I worked as Probation and Parole Agent in the state of South Carolina for approximately five years. In that capacity, I supervised sex offender case loads of up to 120 offenders at a time.

4. As a federal agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

5. The statements in this affidavit are based on my personal observations, my training and experience, my investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a Complaint and Arrest Warrant, I have not included each and every fact known to me concerning this investigation. For the reason listed below, there is probable cause to believe that Donald Sachtleben has distributed and possessed child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (a)(4)(B).

BACKGROUND OF INVESTIGATION

6. On September 12, 2010, a Special Agent (SA) with the FBI who was working in an undercover capacity, signed into the GigaTribe file sharing program and observed that an individual utilizing the user name "pedodad36569" was logged into the network. The undercover SA browsed pedodad36569's shared directories and subsequently downloaded two hundred and twenty (220) images depicting child pornography (CP) directly from pedodad36569 between 11:34 PM (CST) and 12:08 AM (CST).

7. Results from an Administrative Subpoena for Internet Protocol (IP) address 68.115.30.125 found that the customer utilizing this IP was Russell H. Schaefer, 8686 Fig Tree, Roscoe, Illinois 61073.

8. Before a search warrant was obtained for 8686 Fig Tree, Roscoe, Illinois, 61073, the Illinois Internet Crimes Against Children (ICAC) received a similar lead from a different law enforcement agency, and obtained and served a search warrant on the address. During the execution of the search warrant,

the ICAC investigators learned that the occupants had an open wireless connection; and none of the computers at the residence was found to contain CP.

9. Thereafter, several attempts were made to re-contact and download from pedodad365669. However, none of these downloads were able to obtain an IP address for which the data was retained. On December 6, 2011, SA Tim Simon, Innocent Images National Initiative Operations Unit (IINIIOU), contacted SA Shannon McDaniel to indicate that he had recently downloaded additional images from pedodad36569. On December 27, 2011, Sprint identified its customer related to these downloads as Jason Nicoson, 8667 Summerwood, Roscoe, Illinois 61073.

10. On January 9, 2012, a search warrant was executed at 8667 Summerwood, Roscoe, Illinois 61073, and Jason Nicoson admitted to using various online identities to trade images of child pornography. Two computers were seized at the scene, and a preliminary review of both found evidence of child pornography offenses.

11. Pursuant to a search warrant for an email account controlled by Nicoson, SA McDaniel reviewed the contents of this email account and found various users were trading images or videos of child pornography with Nicoson. One such user, pedodave69@yahoo.com, sent Nicoson an email on October 25, 2011, asking to trade, and attaching nine (9) images of child pornography and child erotica. The email stated, "Saw your profile on iMGSCR.RU Hope you like these and can send me some of ours. I have even better ones if you like."

12. E-mailer pedodave69@yahoo.com was last observed by Yahoo! utilizing IP address 76.240.200.17 on February 20, 2012 at 14:44 GMT, which is administered by AT&T. On March 29, 2012, SA McDaniel served an administrative subpoena on AT&T, and on April 11, 2012, they responded and identified their customer as Donald Sachtleben, 11175 St. Andrews Lane, Carmel, Indiana 46032, telephone number XXX-XXX-XXXX (Number redacted herein but known to the Affiant). Thereafter, SA McDaniel ran the IP address 76.240.200.17 through a peer-to-peer aggregation tool for Gigatribe, and found that this IP address has been seen logging onto Gigatribe file sharing network using the account "Logan7032".

13. Your affiant also reviewed the images sent to Nicoson by pedodave69@yahoo.com and descriptions of five of these image files containing child pornography are provided below.

a. Pic211.jpg: This image file depicts three (3) naked prepubescent female that appears to be between the ages of eleven (11) and thirteen (13) years of age. One female is lying on her back on the bed with her legs spread slightly apart. The second female is kneeling next to the first one and has her right hand touching the inside of the first female's leg and is looking at her vagina. The third female has her back to the camera and is sitting next to the first two. She has her left hand pressing against the second female's vagina.

b. FAMO4.jpg: This image file depicts a naked prepubescent female that appear to be between the ages of eleven (11) and thirteen (13)

years of age. Also, in the image is a nude adult female. The child is sitting on a bed with her legs bent and spread apart. The adult female is sitting next to her and is reaching over her leg with her right arm and pressing her fingers against the child's vagina.

c. L1-n2-24.jpg: This image file depicts a naked prepubescent female that appears to be between the ages of ten (10) and thirteen (13) years of age. The child is sitting on a bed and leaning back against a pillow. The child has her legs spread apart and is pulling the skin surrounding her vagina apart, exposing her clitoris. The focal point of the image is the child's genitalia.

d. 09lils.jpg.jpg: This image filed depicts a naked prepubescent female that appears to be between the ages of nine (9) and twelve (12) years of age. The child is standing and leaning back on something while pushing her genitalia area forward. Also, in the picture is a second female that appears to be between the ages of fourteen (14) and seventeen (17) years of age. The older female is leaning between the child's legs and has her tongue on the child's vagina. The focal point of the image is the child's genitalia.

e. Kidx03.jpg: This image file depicts a prepubescent female that appears to be between the ages of eleven (11) and thirteen (13) years of age. The child does not have a shirt on and is standing, looking at the camera. She has pulled her underwear down with both hands and is exposing her genitalia for the camera.

14. On April 30, 2012, your affiant and SA Alan George conducted a wireless survey of the area located in the vicinity of 11175 Saint Andrews Ln, Carmel, Indiana 46032. Results showed two wireless networks, "2WIRE622" with WEP encryption and "dufourhome" with WPA2 encryption indicating both wireless networks require a password to access the router.

15. On April 30, 2012 and May 1, 2012, an NCIC check on Donald Sachtleben was conducted and no records were located.

16. On April 30, 2012, an open source check revealed that Donald Sachtleben resides at 11175 Saint Andrews Lane, Carmel, Indiana 46032 along with his wife, Laurie Sachtleben.

17. On April 30, 2012 and May 1, 2012, a search of law enforcement sensitive data base identified Donald Sachtleben as residing at 11175 Saint Andrews Lane, Carmel, Indiana 46032

18. On May 2, 2012, your affiant conducted physical surveillance of 11175 Saint Andrews Lane, Carmel, Indiana 46032 and noted one vehicle in the driveway described as a red truck.

19. On May 11, 2012, A Federal Search Warrant, issued May 3, 2012, out of the Southern District of Indiana was executed at 11175 Saint Andrews Lane, Carmel, Indiana 46032. The law enforcement officers executing this search warrant included Special Agents of the FBI, as well as law enforcement officers from the Indiana State Police (ISP), and the FBI Cyber Crime Task Force.

20. During the execution of the search warrant, a limited on scene

triage of the evidence was completed on computers and storage media found inside the residence and a vehicle. Approximately 30 image and video files containing child pornography were recovered from within a Hitachi Hard Drive inside a Sony VAIO Laptop. This Sony laptop was found in the backseat of a Chevy Suburban, which Sachtleben drove to the residence from the airport just before the beginning of the search. Sachtleben was observed by FBI Special Agents carrying this laptop in case at the Indianapolis Airport, some minutes before he drove home in this Chevy Suburban with it.

21. The victims in the child pornography found in the Sony VAIO laptop were generally below the age of twelve years. The sexually explicit conduct in the images and video included actual or simulated oral intercourse and/or lascivious exhibition of the genitals or pubic area of the minor.

22. The hard drive of this Sony VAIO laptop was manufactured in Thailand.

23. The child pornography files found in the Sony VAIO laptop included at least one of the files which was previously distributed by pedodave69@yahoo.com to Nicosen, as described above.

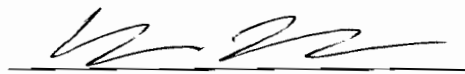
24. ISP Sergeant Barnes and ISP Sergeant Bunner, both of whom are trained forensic examiners, previewed the Sony VAIO laptop and found that it contained references to the names of the five files listed in paragraph 13. The names of these files were found in unallocated space. There were also multiple references to the "pedodave69" username in unallocated space and the master file table. Both of these findings are consistent with the use of this Sony laptop

in connection with the child pornography distribution and possession described above. Finally, various files relating to Donald Sachleben's work were found in the Sony VAIO laptop, indicating that he frequently used the computer.

25. Sachleben's wife was interviewed during the execution of the search warrant and denied any knowledge of the child pornography found in Sony VAIO laptop or any involvement with child pornography distribution or possession. She also stated that Donald Sachleben used a laptop computer.

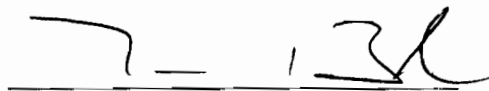
26. Based upon the information listed above, your affiant believes that there is probable cause to believe that Donald Sachleben has distributed and possessed child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (a)(4)(B). You affiant requests the Court to issue a Criminal Complaint and Arrest Warrant charging him with these offenses.

27. Because the Investigation is ongoing, your affiant respectfully requests the Court to seal this Affidavit, Complaint, and Arrest Warrant.



Kerri L. Reifel
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 12th day of May 2012.



Tim A. Baker
United States Magistrate Judge
Southern District of Indiana